

UNITED STATES OF DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

ANDREW PASKOWSKI, :  
ERICK DAWSON, individually and as :  
Parent and NEXT-OF-KIN of :  
Nicholas Dawson, A Minor, JerriAnn :  
Dawson, A Minor and :  
Jennifer Dawson, A Minor :  
JACQUELINE BERNARD, Individually :  
and as Parent and NEXT-OF-KIN of :  
Desire L. Bernard, A Minor and :  
Tam J. Bernard, A Minor, :  
GERALD LEE KEMLER, individually as :  
NEXT-OF-KIN of Decedent, MATTHEW :  
DARBY, ALIAS, :  
DONNA INNAMORATI, Individually and :  
as Parent and NEXT-OF-KIN of Heather :  
Grant, A Minor and Tara Grant, A Minor, :  
ALTON RAMOS, Individually and as :  
Parent and NEXT-OF-KIN of :  
Angelica Ramos, A Minor :

CA 05 002 L

-VS-

:C.A.NO.

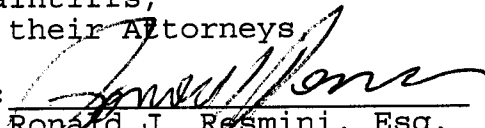
JEFFREY DERDERIAN, ET ALS :

PRO FORMA COMPLAINT  
REGARDING STATION NIGHTCLUB  
FIRE LITIGATION

Plaintiffs in this matter hereby adopt and  
incorporate by reference the First Amended Master  
Complaint in Albert L. Gray, Administrator, et al.  
(Plaintiffs) v. Jeffrey Derderian, et al.  
(Defendants), C.A. No. 04-31L in its entirety.

Plaintiffs,  
By their Attorneys

BY:

  
Ronald J. Resmini, Esq.  
Federal Bar No. 0484

155 South Main St. - Suite 400  
Providence, RI 02903  
DATED: December 22, 2004  
(401)751-8855

## PARTIES

### PLAINTIFFS

(252) The Plaintiff, Andrew Paskowski, resident of 264 O'Neil Rd., Somerset, MA, was a patron of the Station night-club on February 20, 2003 and was lawfully on the premises when the building caught fire and burned to the ground following the use of pyrotechnics by a band performing within the club. He sustained permanent disfigurement, scarring and permanent loss of function.

(253) The Plaintiff, Erick Dawson, resident of Apt. 4, 127 Legris Ave., West Warwick, was a patron of The Station night-club on February 20, 2003 and was lawfully on the premises when the building caught fire and burned to the ground. He was injured when he sustained inhalation injuries (a) Jennifer Dawson, wife of Eric Dawson, alleges claims for loss of consortium and (b) Eric Dawson and Jennifer Dawson brings a claim as mother and next-of-friend of minor children, Jerri Ann and Nicholas Dawson.

(254) The Plaintiff, Jacqueline Bernard, resident of 50 Friendly Rd., Cranston, RI, was a patron of The Station night-club on February 20,

2003, and was lawfully on the premises when the building caught fire and burned to the ground following the use of pyrotechnics by a band performing within the club and (a) brings a claim for loss of consortium for her minor children, Desiree L. and Tam Joseph.

(255) The Plaintiff, Gerald Lee Kemler, jurisdiction address is 54 54 Wyllys St., Glastonbury, CT 06033 on behalf of the wrongful death sustained by Matthew P. Darby who was lawfully on the premises of The Station night-club on Cowesett Ave., West Warwick, RI on February 20, 2003 and died from injuries sustained in the fire. Matthew Darby, dob 12/14/67, was the son of Gerald Lee Kemler and the child of his biological mother, Patty Quintiliani.

(256) The Plaintiff, Donna Innamorati is a resident of, 2675 NE 59th Terrace, Silver Springs, FL 34488-201. Donna Innamorati, was a patron of The Station night-club on February 20, 2003 was lawfully on the premises when the building caught fire and burned to the ground following the use of pyrotechnics by a band performing within the club. Her injuries are psychological and of personal

injuries (a) Donna Innamorati as parent and next-of-friend of minor children seeks loss of consortium for Heather Grant, dob 10/8/86 and Tara Grant, dob 12/28/87.

(257) The Plaintiff, Alton Ramos, also of 3675 NE 59th Terrace, Silver Springs, FL 34488-2017 was a patron of The Station night-club on February 20, 2003 and was lawfully on the premises when the building caught fire and burned to the ground following the use of pyrotechnics by a band performing within the club. Alton Ramos sustained personal injuries and psychological damage and (a) as parent and next- of-friend seeks loss of consortium benefits for Angelica Ramos, dob 6/7/93.

PRAYERS FOR RELIEF  
SUBMITTED ON BEHALF OF THE PLAINTIFFS  
IN ANDREW PASKOWSKI, ET ALS v. JEFFREY DERDERIAN,  
ET AL, C.A.NO. 03-148L


WHEREFORE, the Plaintiffs respectfully pray  
for:

1. Compensatory damages;
2. Punitive damages including attorneys' fees;
3. Costs; and
4. Such other relief as this Court deems just  
and equitable.

JURY DEMAND

The Plaintiffs demand a jury trial on all  
issues triable at law.

Respectfully submitted,  
THE PLAINTIFFS

BY:   
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DATED: December 22, 2004  
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**CERTIFICATION**

I hereby certify that an exact copy of the within document was mailed to the following individuals on this 28 day of Dec, 2004.

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Gail Ann Bernian

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JBL INCORPORATED a/k/a JAMES B. LANSING  
SOUND, INCORPORATED d/b/a JBL PROFESSIONAL  
ESSEX INSURANCE COMPANY  
MULTI-STATE INSPECTIONS, INC.  
HIGH CALIBER INSPECTIONS, INC. :  
UNDERWRITERS AT LLOYD'S, LONDON  
GRESHAM & ASSOCIATES OF R.I., INC.  
ABC BUS, INC., INC. d/b/a ABC BUS LEASING, INC.  
SUPERSTAR SERVICES LLC  
"JOHN DOE" Defendants :

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

TAMMY PASSA, ET ALS :C.A.NO.03-148L  
RONALD KINGSLEY, ET ALS :C.A.NO.03-208L  
ANDREW PASKOWSKI, ET AL :C.A.NO.05-200L

-VS-

JEFFREY DERDERIAN, :  
MICHAEL DERDERIAN, :  
DERCO, LLC :  
HOWARD JULIAN :  
TRITON REALTY LIMITED PARTNERSHIP :  
TRITON REALTY, INC. :  
RAYMOND J. VILLANOVA :  
JACK RUSSELL :  
JACK RUSSELL TOURING, INC. :  
PAUL WOOLNOUGH :  
MANIC MUSIC MANAGEMENT, INC. :  
KNIGHT RECORDS, INC. :  
DANIEL BIECHELE :  
ANHEUSER-BUSCH, INCORPORATED :  
ANHEUSER-BUSCH COMPANIES, INCORPORATED :  
McLAUGHLIN & MORAN :  
WHJY, INC. and CAPSTAR RADIO :  
OPERATING COMPANY :  
CLEAR CHANNEL BROADCASTING, INC. :  
DENIS P. LAROCQUE :  
ANTHONY BETTENCOURT :  
MALCOLM MOORE, in his Capacity as Finance :  
Director of the Town of West Warwick :  
STATE OF RHODE ISLAND :  
IRVING J. OWENS, FIRE MARSHAL :  
BRIAN BUTLER :  
TVL BROADCASTING, INC. :  
STC BROADCASTING, INC. :  
BARRY H. WARNER :  
LUNA TECH, INC. :  
HIGH TECH SPECIAL EFFECTS, INC. :  
AMERICAN FOAM CORPORATION :  
LEGGETT & PLATT INCORPORATED :  
L&P FINANCIAL SERVICES CO. :  
GENERAL FOAM CORPORATION :  
GFC FOAM, LLC :  
FOAMEX LP :  
FOAMEX INTERNATIONAL INC. :  
FMXI, INC. :